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OFFICE OF THE ATTORNEY GENERAL EXECUTIVE BUREAU

July 1st, 2014

Attorney General Martha Coakley Partners Health Care Comment Section 1 Ashburton Place Boston, MA 02108

Re: Partners Health Care Comment Period

Dear Attorney General Martha Coakley,

I am writing regarding my public comments regarding Partners Health Care and I look forward to the response to the comments as required by Justice Janet L. Sanders.

request that Partners Health Care be required of the following before any such merger occurs in the Commonwealth.

- 1. Partners Health Care be required to credential, and recruit, a reasonable number of Chiropractors at each of its health care facilities and hospitals.
- 2. Partners Health Care be required to include Chiropractic providers in all of its ACO's.
- 3. Partners Health Care, through its ownership of Neighborhood Health Plan be required to reimburse Chiropractors for all codes that they are licensed to perform in the Commonwealth of Massachusetts and that such reimbursement should be on par at a minimum with what Blue Cross is receiving or on par with that of physical therapists and on par with examination codes (99201, 99202, and, 99303) reimbursement of primary care physicians. Presently such examination reimbursement, by Neighborhood Health Plan, for Chiropractic Providers is set artificially low and such plan is owned by Partners Health Plan.
- 4. Partners Health Plan should be required to offer, through its Neighborhood Health Plan the same number of visits to Chiropractic Providers as they offer to Physical Therapists for similar diagnosis and treatments. Neighborhood Health Plan discriminates against Chiropractic Providers and their patients

by offering 60 visits a year for a physical therapist while limiting Chiropractic patients with similar conditions and diagnosis to 12 visits a year. As owners of Neighborhood Health plan, they should not be allowed such discrimination.

In health,

Dr. Peter G. Hill

Cc Massachusetts Chiropractic Society.